

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** 05/15/2002/ 11:20 am

**Site Contact(s):** Kim Myers  
**Phone:** 303-966-7106

**Regulatory Contact:** James Hindman  
**Phone:** 303-692-3345

**Agency:** CDPHE

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**Purpose of Contact:** Discussion of a discrepancy in the RSOP Notification letter for the Closure of Building 883 RCRA Tank Units 40.27 and 40.28, approved by CDPHE on 4/30/2002.

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### Discussion

I contacted James to discuss a discrepancy that was found in the Notification Letter, dated April 15, 2002, invoking the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of Building 883 RCRA Tank Units 40.27 & 40.28 (02-DOE-00585), and approved by CDPHE on April 30, 2002. In this letter we stated that clean closure had been attempted for the two tank systems. However, upon review of further documentation, it was discovered that clean closure was not attempted on these tank systems. This documentation states that the sludge and liquid used to resuspend the sludge was pumped out of the tanks and any remaining sludge was manually removed. This was as far as closure activities proceeded when the responsible subcontractor's contract was terminated (mid-1998). At that time the tank systems were declared RCRA Stable, based on a visual inspection of the tanks to verify removal of sludge, no significant risk associated with any remaining residuals, and isolation of the inlets and outlets to the system.

Therefore, when these tank systems (tanks and ancillary equipment) are removed during closure the waste will be managed as Low Level Mixed waste with the following EPA codes applied to the waste: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D028, D029, D035, D038, D040, D043, F001, F002, F003, F005, F007, F008, and F009. The EPA codes D001 and D002 will not apply to the tank system since the debris will not be characteristic for ignitability or corrosivity.

Based on this discussion, James agreed that this contact record would document the change in management of the waste generated by the removal of the tanks systems including all ancillary equipment.

Contact Record 4/10/00

Rev. 10/11/00

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

CEx-105-01

ADMIN RECORD

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**Contact Record Prepared By: Kim Myers, RISS Environmental**

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